

# EXHIBIT 3

**In the Matter Of:**  
**Fair Fight vs Raffensperger**

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**30(b)(6) Hermon Scott**

*November 15, 2019*

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3200 COBB GALLERIA PARKWAY  
SUITE 265  
ATLANTA, GA 30339

1           A.     I said I wasn't there. I didn't say I  
2     didn't know about it.

3           Q.     Okay.

4           A.     A lot of things happen -- happen with our  
5     church that I'm not there, but that doesn't mean I'm  
6     not responsible, or know about it.

7           Q.     Okay.

8           A.     So how does that relate to me?

9           Q.     Well, not so much, how does it relate to  
10    you. If it relates to you, please, by all means,  
11    explain, but I'm just trying to figure out how that  
12    activity fits into the organizational structure of  
13    Baconton, or the operational structure of Baconton.

14                   As I've understood it so far, the  
15    voting-related issues are something that is headed up  
16    by you, as the pastor. This appears to be something  
17    that -- and maybe I'm incorrect, and please correct  
18    me if I'm wrong -- was handled -- or was not  
19    specifically headed up by you. How does that occur?  
20    How does that happen?

21           A.     Well, the young adults do their -- they  
22    have their fellowship. I think probably a better way  
23    of saying it would be voter awareness for that -- for  
24    that day. And so they wanted to do something. And  
25    they did something for voter awareness.

1 Now, it comes back to me the same way as  
2 if I had a family group that got together and did a  
3 family seminar on family. And I'm not necessarily  
4 there, but I'm responsible for it, because it's a  
5 part of my purview as -- for religious instructions.

6 Q. Okay.

7 A. So I don't have to be there for all of it,  
8 but they -- I'm responsible for it.

9 Q. Were you the driving force behind it?

10 A. No, I have some young folk who  
11 said -- well, our young adult ministry, who would  
12 say, yeah, we want to do this. And so I said, by all  
13 means. Because the idea of the young -- young  
14 involvement, youth involvement, and not just voter  
15 registration, but for any aspect of the church, you  
16 want to get as many folk as you can involved. And  
17 once they get involved, and they have idea, I'll say,  
18 yep, let's try it. Go for it.

19 Q. Okay.

20 A. And they will make it happen.

21 Q. Okay. So they gave you a heads up  
22 beforehand?

23 A. Yes.

24 Q. Okay. They have it pretty much all  
25 figured out, what they were going to do?

1                   And I believe we've discussed -- and  
2           again, I don't want to rehash it -- the policies, the  
3           legislation, the statute that you believe fulfill  
4           that statement, correct?

5           A.       Uh-huh.

6           Q.       Do you believe -- or do you understand  
7           that the Secretary of State or the State Election  
8           Board, the defendants in this case, have discretion  
9           in which statutes to enforce?

10          A.       Ask me that again?

11          Q.       Do you believe -- or do you understand  
12          that the Secretary of State, the State Election  
13          Board, it indicated enforced unconstitutional and  
14          otherwise unlawful legislation, created and enforced  
15          unconstitutional and otherwise unlawful policies, and  
16          engaged in gross mismanagement that resulted in an  
17          election -- just to pare down what refers to -- to  
18          what, in terms of the legislation that you believe is  
19          unconstitutional and unlawful, is it your position  
20          that the Secretary of State and the State Election  
21          Board have discretion in choosing to enforce those  
22          laws?

23          A.       They have no -- no discretion in enforcing  
24          the law.   However, what I believe is that federal  
25          law, federal court cases, they will supersede